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JAN 29 2016

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOEL ALEXANDER WRIGHT

Defendant.

Case No.: '16 MJ0277

COMPLAINT FOR VIOLATION OF

Title 18, U.S.C., §2423(b) – Travel
with Intent to Engage in Illicit Sexual
Conduct; Title 18, U.S.C., §2241(c) –
Aggravated Sexual Abuse of a Child

The undersigned complaint being duly sworn states:

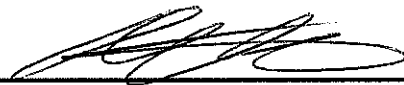
Count 1

On or about January 29, 2016, within the Southern District of California, and elsewhere, defendant JOEL ALEXANDER WRIGHT, a United States citizen did attempt to travel in interstate and foreign commerce, to wit: from Ohio to California for the purpose of engaging in any illicit sexual conduct (as defined by 18 U.S.C. §2423(f)) with another person; in violation of Title 18, United States Code, Section 2423(b).

Count 2

On or about January 29, 2016, within the Southern District of California, and elsewhere, defendant Joel Alexander WRIGHT did cross state lines with intent to engage in a sexual act (as defined by 18 U.S.C. §2246(2)) with a person who had not attained the age of 12 years; in violation of Title 18, United States Code, Section 2241(c).

1 And the complainant states that this complaint is based on the attached statement
2 of facts, which is incorporated herein by reference.
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7 Peter J. Olesen, Special Agent
8 Homeland Security Investigations
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10 Sworn to before me and subscribed in my presence, this 29th day of January,
11 2016.
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14 Hon. RUBEN B. BROOKS
15 United States Magistrate Judge
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1 return to the hotel with the child. The RP never returned to WRIGHT, with a child or
2 otherwise.

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4 Law Enforcement database records reveal that WRIGHT entered into the United
5 States from Mexico at the San Ysidro Port of Entry via the pedestrian lanes on July 20,
6 2014 at 10:55pm and on July 21, 2014 at 8:23am using a Passport Card assigned to him.
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8 These crossings by WRIGHT are consistent with the timeframe that the RP stated
9 WRIGHT had travelled to Tijuana for the adoption of a child.

10 The RP stated that he again communicated with WRIGHT beginning in July 2015
11 after finding another Craigslist advertisement, in which WRIGHT was seeking a travel
12 guide. WRIGHT was using an email address with username "Joel Wright," while the RP
13 was using a new email address. WRIGHT's conversation initially centered around
14 travelling to Tijuana for a medical appointment, meeting a woman to marry, and adopting
15 a child. The conversation eventually shifted to WRIGHT's desire to engage in illicit
16 sexual conduct with female infants. On November 25, 2015, when asked if he had sexual
17 experience with infants, WRIGHT emailed that "I have not gone all the way before but I
18 have made it very close in the past so I do have experance." [sic]
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1 On December 3, 2015, an HSI Undercover Agent (UCA) took over the RP's email
2 account, with the RP's consent, and began communicating with WRIGHT. On
3 December 6, 2015, WRIGHT stated in an email that "I think one fun thing we could do at
4 the same time with the infant baby is you could be in her mouth with your thing and I
5 could be penetrating her so she would be getting it from both ways and she would suck
6 you probably really hard and with the 4 year old I think I will spank her a while to warm
7 her up and make her a little angry so we can chase her around the place and I will
8 penetrate her very hard which will be fun and if she is angry at me she will be even more
9 fun because she will probably try to get away and it is so much more fun when it is a bit
10 of a struggle --- what do you think?"
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12 On December 10, 2015, HSI San Diego SA A. Rios purchased an airline ticket for
13 WRIGHT at WRIGHT's request for travel to San Diego, California from Columbus,
14 Ohio. WRIGHT provided his full name as "Joel A Wright" and his date of birth and
15 requested "disability assistance" to the UCA to purchase the airline ticket. WRIGHT
16 intended to ultimately travel to Tijuana to engage in illicit sexual conduct with an infant.
17 WRIGHT stated to the UCA that he had "...some experance but i haven't really tried
18 anything to risky but i plan on going all the way when i visit i think we will have a 1 and
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1 4 so it should be great and i am more than happy to do some of it live for you so you can
2 enjoy.” WRIGHT referred to the one year old and four year old children he believed that
3 he was going to engage in the sex acts with. Travel was to occur on December 11, 2015,
4 but WRIGHT never boarded the plane and sent an email to the UCA stating that he was
5 not going to travel. WRIGHT emailed the UCA “I will not be coming tomorrow Friday.
6 Please don’t ever contact me again for anything. being you are within the 24 hours of
7 purchasing the ticket you can get a full refund. so don’t ever contact me again and I wish
8 to have nothing to do with any of your projects or clubs or anything you do. I here by
9 revoke any promises or relationships we may have entered into.” Prior to the purchase of
10 the airline ticket, WRIGHT offered to repay the UCA a percentage of the airline ticket in
11 installments of \$90.00, beginning the following month. WRIGHT also offered to give
12 the UCA the four year old child he was planning to adopt, “so i could give you the 4 as a
13 present after I finish... and you would have the 4 to keep.” As collateral, WRIGHT
14 offered the UCA a vintage European military jacket and DVD sets of multiple television
15 series. Communication with WRIGHT ceased at that time.
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1 On December 28, 2015 at approximately 2:47pm, an advertisement was posted in
2 the general community section of the Tijuana, Mexico Craigslist website. The
3 advertisement was titled, "looking for female tourguide." The advertisement read in part
4 "...looking for a female who can help me when I visit and show me local attractions and
5 good food along with places to have fun and introduce me to good people. please
6 respond with your email and contact information and a pic..." On January 13, 2016, the
7 RP created a fictitious email account, purporting to be a female tour guide, and responded
8 to the advertisement. That same day, the RP received a response from the same email as
9 before (described above) with the username Joel Wright, with the question "... is there
10 anything you won't do for me or help me with?" WRIGHT stated via email that he "...
11 goes by the name Joel so that is fine to call me it."

12 On January 14, 2016, WRIGHT emailed the RP stating "I want to adopt / own a
13 baby girl (under the age of 3) and I want to have intercourse with her after I own her but
14 don't be telling people that --- I can come next Thursday but I won't pay until I have seen
15 the baby and I will pay the parents then. ... the cheapest baby girl under 3 would be
16 good... and call me by the name Francis..." WRIGHT asked in a subsequent email "...
17 for the baby girl to have overnight can I fully penetrate her and how old is she...?" In a
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1 follow-up email message WRIGHT stated, "I want the three babies to play with and
2 penetrate. i am real – so like for next week can you set it up for me and so you have pics
3 of them in fun positions or any videos of them." WRIGHT also sent a photo of himself
4 and stated "this is me (Francis) with a friend of mine ya I know I am kind of fat and don't
5 look all that great. I am the one wearing the hat." WRIGHT asks the RP via email "will
6 you stay for a little while in the hotel to watch me with them and video some of me
7 playing with them? yes i want all 3 of them and it will be so great." WRIGHT stated via
8 email that "i live on the east coast of the US so i probably will be flying although i have
9 taken the greyhound from Boston MA all the way to TJ and lets just say that was
10 exciting..." WRIGHT was asked via email, by the RP, if he had previous experience
11 with infants, to which he replied via email "... i have some experance in the past and yes i
12 plan on doing oral as well baby girls are so good at sucking and penetrating is so much
13 fun with them and well chasing them around and doing all that stuff is a lot of fun i am
14 glad you will be able to video it and spend the time with me and i am looking forward to
15 being your friend..." WRIGHT stated "yes i will bring the money and all that good stuff.
16 and yes i will bring some candy and i will also bring some lubricant for the babies to
17 make them nice and soft. but i do plan on penetrating fairly hard ok."

1 On January 15, 2016, WRIGHT stated via email that "virgin babies are the best
2 and the ones that you have found sound good and that the parents are willing to have
3 them rented out is so cool. so yes I want the 1 2 and 3 year old that you have found for
4 me. we willtake videos and have all kinds of fun... I plan on playing hard and
5 penetrating all of them but the older to a lot harder than the 1 year old – i will be gentle
6 with her and i plan on kissing all of them all over them and doing all kinds of fun stuff."
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8 WRIGHT stated "... with the 3 year old I will be the hardest to and I will be kind of hard
9 with the 2 year old but I will be gentle with the 1 year old and first I will start out gentle
10 with the older one and then get gradually harder as they are warmed up. I do plan on
11 spanking them as well to get them in the right position. and I think with the older 3 year
12 old I will be kind of hard to and spank hard because well I like them when they get a little
13 mad and start crowllling about and you have to chase them around the room. we will
14 need to get some children's tylenol to relax them and candy to help them be relaxed.
15 Does the bathroom have a bath where I can take a bath with all of them?...we can totally
16 sell the videos and make money – that will be great... all I ask is when you take the video
17 not to show my face... if they haven't been penetrated before they tend to bleed a little
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1 the first time – so we will need cream and wipes.” WRIGHT also stated “yes i like
2 church – it makes me feel good.”

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4 On January 19, 2016, HSI San Diego SA’s assumed the email account used by the
5 RP, to communicate with WRIGHT. On January 23, 2016, WRIGHT stated via email
6 that he “... picked up a infant pain relief med and a pretty outfit which I think should fit
7 the 1 or 2 year old.” In a subsequent email, WRIGHT stated that he “... will try to find
8 some lube here at the store that we can use.”
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10 On January 25, 2016, WRIGHT stated via email that he had purchased an
11 American Airlines ticket to travel from Ohio to San Diego, California on January 29,
12 2016, arriving at 11:30am. On January 26, 2016, an HSI San Diego SA A. Rios spoke
13 with a customer service manager with American Airlines who confirmed that WRIGHT
14 purchased the airline ticket for travel on January 29, 2016. The customer service
15 manager provided a printout of the WRIGHT’s reservation which displayed American
16 Airlines flight #584 departing CMH at 7:25am and arriving at PHX at 10:09am, and
17 American Airlines flight #623 departing PHX at 11:15am and arriving at SAN at
18 11:31am.
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1 On January 28, 2016, WRIGHT stated via email that he is "... so looking forward
2 to it. it will be so great to spend time with you all and have fun with the babies. I will
3 leave early Friday morning for an early flight and arriving at san diego around lunchtime
4 so it should be great." WRIGHT was offered transportation upon arriving in San Diego.
5 WRIGHT was instructed to call the UCA to be picked up on Friday at the San Diego
6 International Airport. On January 28, 2016 at 12:33pm, WRIGHT called the UCA from
7 phone number 614-xxx-0319 (purposefully omitted), and identified himself as "Francis,"
8 and wanted to confirm that the UCA would pick him up on Friday and to inform the
9 UCA they he has difficulty seeing.
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13 On January 29, 2016, Wright deplaned from the scheduled flight in San Diego and
14 called the UCA and said he was down baggage claim. Wright was arrested outside the
15 baggage claim area with a cell phone and a duffle bag.
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